



2014 –15 Federal Program Monitoring (FPM) Training Workshop

Compensatory Education (CE)
Improvement and Accountability Division

Title I Monitoring and Support Office

August 1, 2014 Sacramento

August 6, 2014 Pomona

CALIFORNIA DEPARTMENT OF EDUCATION

Tom Torlakson, State Superintendent of Public Instruction



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2014 –15 FPM Process

- Part One: Review of Documentation via California Accountability and Improvement System (CAIS)
- Part Two: Classroom Observation of Program Implementation
- Part Three: Interviews with Teachers, Staff, Administrators, and Parents



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Presentation Outcomes

Knowledge and Understanding:

- Meeting CE Item Requirements
- Preparing for a Successful FPM CE Review
- CE Instrument located on the California Department of Education (CDE) Compliance Monitoring Web page at <http://www.cde.ca.gov/ta/cr/>



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Frequent Non-Compliant CE Items

CE 02 School Parent Involvement Policy

CE 07 School Site Council (SSC)

CE 08 SSC Approves Single Plan for
Student Achievement (SPSA)

CE 17 Local Educational Agency (LEA)
Disburses Funds Consistent with
Consolidated Application and
Reporting System (CARS)



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Frequent Non-Compliant CE Items (Cont.)

CE 18 Supplement, Not Supplant

CE 19 LEA Administrative Charges; Time Accounting

CE 20 LEA Equipment Inventory

CE 27 LEA/SSC Evaluate SPSA Services



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CE 02

Parent Involvement

With approval from the local governing board, each Title I school shall jointly develop with, and distribute to, parents of Title I students a written parental involvement policy agreed upon by such parents, and updated periodically to meet the changing needs of parents and the school.

CE 02 Parent Involvement (Cont.)



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School-Parent Compact samples are located on the CDE Parent/Family Web page at <http://www.cde.ca.gov/ls/pf/pf/>.



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CE 02 Actual Finding

“School-level parental involvement policies, for all sites reviewed, are missing elements CE 2.2 (c) and 2.4 (d) and (f).

The school-parent compact (CE 2.3) is missing meeting minutes demonstrating how the compact was jointly developed and evidence of distribution to parents of Title I, Part A students.”



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CE 02 Actual Resolution

“To resolve this finding, the LEA must submit evidence demonstrating that school-level parental involvement policies include all required elements and that the school-parent compacts have been jointly developed with and distributed to parents.”



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CE 07 SSC

The SSC is composed of the principal and members selected by peers from the following constituency groups:

- Classroom teachers
- Other school personnel
- Parents and community members
- Students (secondary schools)



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Example: SSC Composition Configurations for Elementary Schools

Principal	1	1	1
Classroom teachers	3	4	4
Other staff	1	1	2
Parents/community members	5	6	7
Total members	10	12	14



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Example: SCC Composition Configurations for Secondary Schools

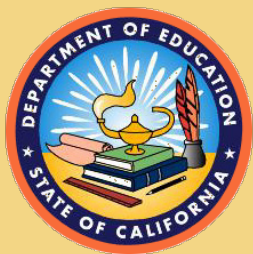
Principal	1	1	1
Classroom teachers	4	5	6
Other staff	1	2	3
Parents/community members	3	4	5
Students	3	4	5
Total members	12	16	20



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CE 07 Actual Finding

“The school has not documented how peer selection requirements for teachers, other staff, parents, and students who are members of the SSC are met.”



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CE 07 Actual Resolution

“To resolve this item, the school must submit evidence to show how teachers were selected by teachers; other personnel were selected by other personnel; parents or community members were selected by parents; and students were selected by students.”



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CE 08

SPSA

The SSC annually develops, reviews, updates, and approves the SPSA, including proposed expenditures. The SPSA contains elements (a) through (e).



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CE 08 SPSA (Cont.)

The SPSA must contain:

- (a) An analysis of academic performance data to determine students' needs.
- (b) School goals to meet the identified academic needs of students.
- (c) Activities to reach school goals that improve the academic performance of students.
- (d) Expenditures of funds allocated to the school through the Consolidated Application (ConApp.)



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CE 08 SPSA (Cont.)

The SPSA must contain:

- (e) The means of annually evaluating the progress of programs toward accomplishing the goals, including determining whether the needs of all children have been met by the strategies used, particularly the needs of low-achieving students and those at risk of not meeting state academic content standards



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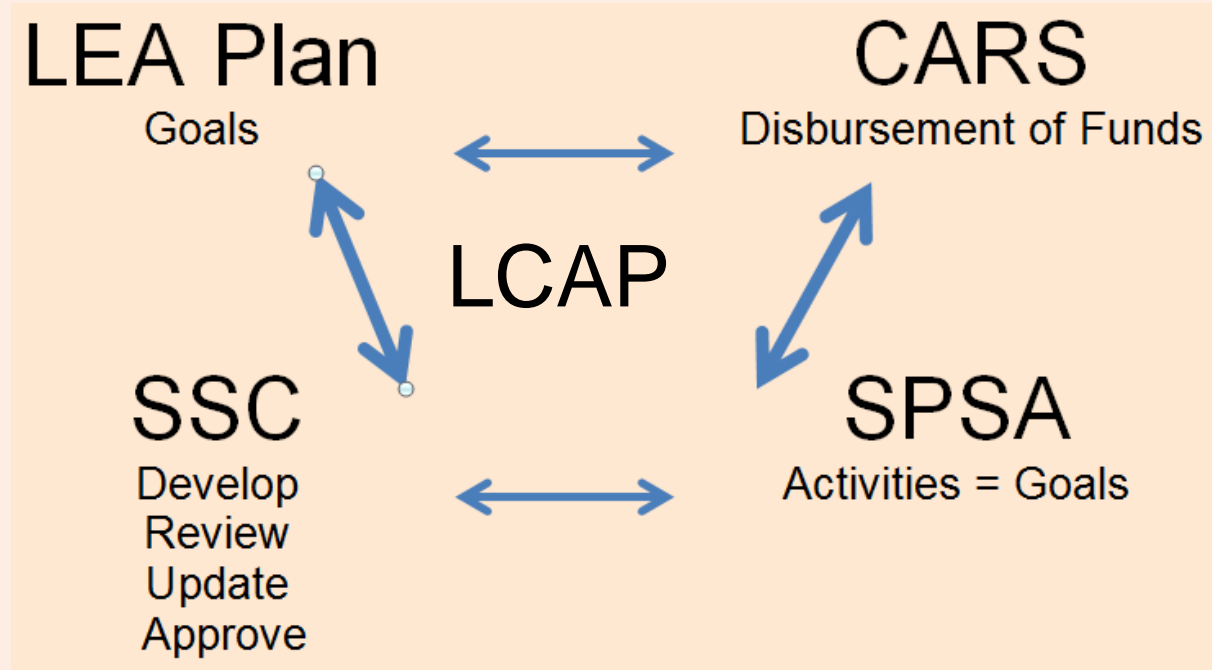
CE 08 Other Requirements

- Local board approval of SPSA (CE 8.1)
- Consistent with LEA Plan goals (CE 8.2)
- Parent involvement in SPSA (CE 8.3)
- All Title I school requirements (CE 8.4–8.10)
- Targeted Assistance School (TAS) (CE 8.11)
- Schoolwide Programs (SWP) (CE 8.12–8.15)
- Program Improvement (PI) School requirements (CE 8.18–8.19)



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SPSA





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CE 08 Actual Finding

“During the review of the SPSA for the school, evidence was not provided to show how the SSC developed and updated the SPSA, nor were elements CE 8.0 (a), CE 8.0 (c), CE 8.0 (d), CE 8.1, CE 8.2, CE 8.3, CE 8.9, CE 8.10, or CE 8.12 included in the SPSA.”



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CE 08 Actual Resolution

“To resolve this item, the district must submit 2014–15 SPSAs for the school, including evidence to show how the SSC developed, reviewed, updated, and approved the SPSAs. The plans must include all applicable elements CE 8.0 through CE 8.19.”



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CE 17 CARS

The LEA disburses Title I, Part A funds in accordance with the approved CARS.



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CE 17.1

CARS

For programs funded by Title I, Part A, the LEA uses no less than 85 percent of those funds at school sites for direct services to students.

- Title I, Part A Required Reservations
- Title I, Part A Allowed Reservations
- Title I, Part A Allocations to schools



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CE 17.2

CARS

The LEA expends Title I, Part A funds reserved in CARS for the stated and approved purpose of the reservation.



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CE 17 Allowed Reservations and Centralized Services

It is important to make clear the distinction between LEA assistance provided to Title I schools through allowed reservations and through centralized services.

- Allowed reservations made by the LEA in the CARS (document services to schools)
- Centralized Services paid from a school's Title I, Part A allocation, first approved by the SSC and documented in the SPSA



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CE 17.3 CARS

The LEA has written assurances showing comparability of services across district schools that address:

- LEA salary schedule
- Equivalence among schools in teachers, administrators, and other staff
- Equivalence among curriculum materials and instructional supplies

See the CDE Title I, Part A Comparability Documents at

<http://www.cde.ca.gov/sp/sw/t1/compar.asp>



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CE 17.4

CARS

The LEA has conducted yearly calculations to demonstrate compliance and maintains data to support:

- Allowable exclusions of funds and/or staff from the calculations
- Schools skipped for funding and locally funded charter schools have been included
- Data for staff and students were collected on the same date



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CE 17.0 Actual Finding

“The document review did not indicate the school district disbursed the Title I, Part A funds allocated to school A (\$90,844) ... and school B (\$564,439) ... as listed in CARS.”



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CE 17.2 Actual Finding

“The reservations in the CARS for Parent Involvement, Choice, Supplemental Educational Services (SES), LEA Professional Development, Summer School, Administration, and Professional Development (\$91,000 allowable) were not supported with budget documents to prove these reservations are being spent on the stated and approved purpose.”



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CE 17 Resolution

“To resolve this item, the school district must submit evidence to include position descriptions, 2013–14 budget documents (including required and allowable reservations), and 2013–14 SPSAs to show the above reservations and disbursement of Title I, Part A funds has occurred in accordance with the approved CARS.”



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CE 18

Supplement vs. Supplant

The LEA uses Title I, Part A funds only to supplement, and not supplant, state and local funds.



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CE 18 Actual Finding

“During the document review, interviews with staff, and observations, it was determined that the school district is supplanting general funds by funding a Library Clerk and Career Technical Clerk at school A; two paraprofessionals in the kindergarten classrooms at school B; and by purchasing school supplies that support the core educational program that must be purchased with general funds.”



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CE 18 Actual Resolution

“To resolve this item, the district must provide journal entries, budgets, expenditure reports, and personnel activity reports as evidence that the expenditures for the above positions have been reversed out, effective July 1, 2014, of Title I, Part A and spent on an allowable Title I, Part A activity.

In addition, the purchases of \$2,797.22 in document R13088, \$2,871.00 in document 133166, and \$1,345.26 in supply requisition document 13217 have been reversed out of Title I, Part A funds and spent on an allowable Title I, Part A activities.”



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CE 19

LEA Time Accounting

- Charges to Federal Awards for salaries and wages, whether treated as direct or indirect costs, will be based on payrolls documented in accordance with generally accepted practice of the governmental unit and approved by a responsible official(s) of the governmental unit.



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CE 19.1

LEA Time Accounting

- Each employee paid in part from a single cost objective and in part from other revenue, or an employee paid from multiple cost objectives, completes a Personnel Activity Report (PAR) each pay period, or an approved sampling method is used.



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CE 19.2

LEA Time Accounting

- Employees funded under a single cost objective by Title I SWP, and employees funded with state funds under the School Based Coordinated Program (SBCP), complete a semiannual certification of such employment.



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CE 19.2

LEA Time Accounting (Cont.)

- Employees who work solely on activities funded with consolidated Elementary and Secondary Education Act (ESEA) administrative funds are also deemed funded by a single cost objective and complete a semiannual certification.



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CE 19 Actual Finding

“The district did not provide complete personnel activity reports (PARs) for school staff funded 50% with Title I funds that show hours worked under each funding source or evidence that they work on a fixed school-period schedule for which monthly time certifications are adequate. In addition, the district did not provide appropriate time-accounting documents or job descriptions for several district staff paid 100% from Title I funds.”



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CE 19 Actual Resolution

“The district must upload complete PARs for school staff at the 3 schools reviewed who are funded 50% with Title I funds that show hours worked each day under each funding source or provide evidence that they work on a fixed school-period schedule for which the monthly time certifications are adequate. In addition, the district must upload the latest semiannual certification and a job description or duty statement reflecting actual work for each district staff person funded 100% from Title I.”



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CE 20

LEA Equipment Inventory

- For all categorical programs, the LEA maintains a historical inventory record for each piece of equipment with an acquisition cost of \$500 or more per unit that is purchased with state and/or federal funds.



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CE 20

LEA Equipment Inventory (Cont.)

The record describes the acquisition by:

- Type/description
- Model/name
- Serial number
- Funding source
- Acquisition date
- Cost
- Location
- Current condition
- Transfer, replacement or disposition of obsolete or unusable equipment



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CE 20.1

LEA Equipment Inventory

- The school district has conducted a physical check of the inventory of equipment within the past two years and has reconciled the result with inventory records.



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CE 20 Actual Finding

“Although the district provided a historical inventory of equipment purchased with Title I and other categorical funds, it did not include (h) “Current condition” and (i) “Transfer, replacement or disposition of obsolete or unusable equipment” in the inventory records. The district also did not provide evidence of a physical check of the inventory of equipment within the past two years and reconcile the results with its equipment inventory.”



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CE 20 Actual Resolution

“The district must conduct a physical check of its inventory of equipment or provide documentation that it has conducted one in the last two years, and it must reconcile the results with the historical equipment inventory, including information for (h) and (i) in each record. When the physical check has been conducted and/or documented and the equipment inventory has been updated and revised to include elements (h) and (i) in each record, the district must upload physical check documentation and the revised equipment inventory.”



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CE 27

SPSA Evaluation

The SSC and the LEA annually evaluate and determine if the needs of all children have been met by the strategies described in the SPSA, particularly the academic achievement needs of low-achieving students and those at risk of not meeting state academic content standards.



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CE 27

SPSA Evaluation (Cont.)

- In Title I TAS, the SSC shall review, on an ongoing basis, the progress of participating students and revise the targeted assistance program, if necessary, to provide adequate assistance to enable them to meet the State's student academic standards.
- In Title I SWP schools, the SPSA describes how the school will implement all components of the SWP.
- In all Title I schools, the SPSA goals shall be based on an analysis of verifiable data.



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CE 27 Actual Finding

“Documents and interviews do not indicate that the SSC annually evaluated and determined whether the needs of all children have been met by the strategies described in the SPSA, particularly the academic achievement needs of low-achieving students and those at risk of not meeting state academic content standards.”



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CE 27 Actual Resolution

“The LEA must submit evidence that the school has developed a process to meet evaluation requirements. The evaluation plan must indicate how the SSC will use results to improve and modify program services funded with Title I to ensure identified students meet state academic standards.”



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Key Documents to Upload into CAIS

- LEA and school parent involvement policies and compacts (CE 01, CE 02)
- LEA Plan (CE 04)
- SSC membership documents (CE 07)
- SPSA (CE 08)
- LEA categorical programs summary budget and expenditure reports (CE 17, CE 18)
- LEA time accounting records (CE 19)
- LEA Title I program evaluation, SPSA evaluation documents, and SSC agendas and minutes (CE 26, CE 27)
- LEA Equipment Inventory (CE 20)



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FPM CE Review Preparation

- Involve all relevant local educational agency (LEA) and school staff
- Review the specific legal requirements of each CE item
- Determine which CE items are applicable and not applicable to your LEA and schools
- Take action to address legal requirements
- Collect electronic forms of all associated and required documents
- Review collected documents to confirm whether or not all CE requirements are met



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Uploading and Managing Documents in CAIS

- Provide specific titles and descriptions for each document uploaded to CAIS
- Upload associated documents and required and suggested documents 30 days prior to the FPM review
- Respond to CE reviewer requests for additional documentation



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Suggestions

Do

- Use specific titles and file names
- Provide file description
- Address all parts of CE items and sub-items
- Upload relevant documents only
- Response to CE reviewer requests for additional documentation
- Send comments when uploading additional documents

Do not

- Use generic titles and file names
- Leave description blank
- Only address CE item title or first paragraph
- Upload documents in a “hit or miss” manner
- Ignore CE reviewer requests for additional documentation
- Upload additional documents without sending comments



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Questions?